

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Mahmoud KHALIL,

Petitioner,

v.

Donald J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; Marco RUBIO, in his official capacity as Secretary of State; and Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice,

Respondents.

Case No. 25-cv-01935

DECLARATION OF VERONICA R. SALAMA

I, Veronica R. Salama, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. My name is Veronica R. Salama. I am a licensed attorney in good standing in the state of New York. I am an attorney of record in the above-captioned case.
2. I represent the petitioner, Mahmoud Khalil, in this action.
3. I submit the following documents in support of Mr. Khalil's motion for preliminary injunctive relief in this action:
 - a. Attached hereto as **Exhibit A** is a true and correct copy of the Politico article by Amanda Friedman, titled "Rubio Defends Detainment of Columbia Activist, Says More Arrests Will Come," published on March 16, 2025. I downloaded and saved this article in PDF format; it is also available at <https://perma.cc/U3DR-KCPL>.
 - b. Attached hereto as **Exhibit B** is a true and correct copy of the NYTimes article by Luis Ferré-Sadurní and Hamed Aleaziz, titled "How a Columbia Student Fled to Canada After ICE Came Looking for Her," published on March 15, 2025. I downloaded and saved this article in PDF format; it is also available at <https://perma.cc/3YH3-5U5K>.

- c. Attached hereto as **Exhibit C** is a true and correct copy of the full transcript of an interview with Troy Edgar, the Deputy Secretary of the Department of Homeland Security, on NPR's *Morning Edition* on March 13, 2025. I downloaded and saved this transcript in PDF format; it is also available at <https://perma.cc/N6QY-4PWF>.
- d. Attached hereto as **Exhibit D** is a true and correct copy of the Associated Press article by Jake Offenhartz, titled "Immigration Agents Arrest Palestinian Activist Who Helped Lead Columbia University Protests," published on March 9, 2025. I downloaded and saved this article in PDF format; it is also available at <https://perma.cc/HPH9-T2SV>.

Executed on March 17, 2025
New York, New York



Veronica R. Salama
Staff Attorney
New York Civil Liberties Union Foundation